

**SheppardMullin**

Sheppard, Mullin, Richter & Hampton LLP  
30 Rockefeller Plaza  
New York, New York 10112-0015  
212.653.8700 main  
212.653.8701 fax  
www.sheppardmullin.com

**MEMO ENDORSED**

212.634.3043 direct  
jstoler@sheppardmullin.com

February 25, 2021

**VIA ECF**

The Hon. Kenneth M. Karas  
United States District Court  
Southern District of New York  
The Hon. Charles L. Brieant Jr.  
Federal Building and United States Courthouse  
300 Quarropas Street  
White Plains, NY 10601-4150

Re: *Lawrence v. Northwell Health, Inc.*, Case No. 19-CV-7448 (KMK)(JCM)

Dear Judge Karas:

We represent Defendant, Northwell Health, Inc. We write to request that the Court adjourn any deadlines for the submission of pre-motion letters regarding dispositive motions in this matter until a date to be determined by the Court at the parties' upcoming March 9, 2021 status conference.

On July 30, 2020 (Dkt. 23), Your Honor adopted a Case Management Plan and Scheduling Order that provided for fact discovery to conclude by November 27, 2020, for all expert discovery to be concluded by January 15, 2021; and for any pre-motion letters to be submitted to the Court by January 27, 2021, with responses to such letters due by February 4, 2021. However, Section 8 of the Case Management Plan also states that all dispositive motions are due at the close of discovery, and that the parties must request a pre-motion conference at least two weeks prior to this deadline.

By Order dated November 10, 2021 (Dkt. 30), Your Honor granted the parties' joint request for a 60-day extension of all deadlines in the Case Management Plan. Since that time, by Order dated January 22, 2021 (Dkt 37), Magistrate Judge McCarthy granted Plaintiff's request to extend the deadline for completion of depositions and other fact discovery until February 25, 2021. Magistrate Judge McCarthy later extended that deadline for one more day, until February 26, 2021, to accommodate the scheduling request of a non-party witness whom Plaintiff wished to depose.

In light of the foregoing, to remove any ambiguity regarding pending deadlines, and due to the fact that fact discovery will not be completed until February 26, Defendant respectfully requests that the Court adjourn any pending deadlines for the submission of pre-motion letters in this matter, and that the Court set deadlines for the same and for any dispositive motions at the parties' March 9, 2021 status conference. Other than the parties' joint November 10, 2020 request to extend all deadlines in the Case Management Plan, Defendant has not made any previous requests for adjournments of these deadlines. Plaintiff's counsel consents to this request.

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Thank you for the Court's attention to this matter.

Respectfully submitted,

/s/ Jonathan Stoler

Jonathan Stoler  
for SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

SMRH:4844-2087-4205.1

cc: All Counsel of Record

Instead of extending the PMC Letter deadline, the Court will move the 3/9/21 conference to 4/15/21 at 2:00 pm. The movant's pre-motion letter is due 4/1/21; the non-movant's response is due 4/8/21.

So Ordered.



2/25/21